

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

ALBERTO FIGUEROA HERNANDEZ  
NILDA I MORALES MORALES

Debtor(s)

Case No: 10-09058 SEK

Chapter 13

**ANSWER TO MOTION TO DISMISS FILED BY CHAPTER 13 TRUSTEE**

TO THE HONORABLE COURT:

**NOW COMES** the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That the Chapter 13 Trustee has filed a Motion to Dismiss for failure to comply with 11 U.S.C § 1308. (Docket #18)
2. That at confirmation hearing held on November 30, 2010, debtor were granted 21 days to submit other documents requested by trustee for the favorable recommendation of the plan.
3. That debtors operates a business and it has become complicated to close the store and gesture documents with the government agencies at this season and are still pending to submit copy of Insurance Quote, Ivu Certificate and Patente Municipal and request and addition extension of 10 to 15 days to complete documents.

**WHEREFORE**, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned deny the trustee's motion requesting dismissal and grant an additional extension of 15 days to submit pending documents.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

**In San Juan, Puerto Rico this 4th day of January of 2011.**

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.